## 

## Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000 FACSIMILE: +1-212-455-2502

Direct Dial Number 212-455-3070

## **MEMO ENDORSED**

E-mail Address
Brooke.Cucinella@stblaw.com

BY ECF

September 27, 2021

Re: United States v. Ruless Pierre, 19 Cr. 783 (SHS)

Honorable Sidney H. Stein United States District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007-1312

Dear Judge Stein:

We represent Ruless Pierre in the above-captioned matter, which is scheduled for sentencing on October 15, 2021. We write with the Government's consent to respectfully request a 45-day adjournment of the sentencing date and that the parties' deadlines to file sentencing submissions be adjusted accordingly.

The purpose of this application is to allow sufficient time to collect mitigating information, prepare Mr. Pierre's sentencing submission, and prepare Mr. Pierre for sentencing. Mr. Pierre has advised defense counsel that he has been dealing with certain family issues, which have complicated the defense's preparations for sentencing. In addition, we plan to engage with the Government in the near term on issues relating to restitution.

If granted, we respectfully request that the Court avoid scheduling the sentencing hearing during the last two weeks of December.

We thank the Court for its consideration of this request, which we anticipate to be Mr. Pierre's final request for an adjournment.

BEIJING HONG KONG HOUSTON LONDON LOS ANGELES PALO ALTO SÃO PAULO TOKYO WASHINGTON, D.C.

## 

Simpson Thacher & Bartlett LLP

Honorable Sidney H. Stein

-2-

September 27, 2021

Respectfully submitted,

Brooke E. Cucinella

Mark J. Stein

cc: AUSA Drew Skinner (by ECF)

The sentencing is adjourned to December 28, 2021, at 10:00 a.m. The defense submissions are due by December 7, the government's submissions are due by December 14.

Dated: New York, New York September 27, 2021

SO ORDERED

Sidney H. Stein, U.S.D.J.